

REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 1, 11 and 17 are amended. The amendments introduce no new matter. Support for amended claims 1, 11 and 17 can be found, for example, on page 6, lines 18-25 of the specification. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

The Office Action, on page 10, indicates that claims 7, 9 and 10 recite allowable subject matter. Specifically, these claims are indicated as allowable if rewritten in independent form to include all of the features of the base claim and any intervening claims. Applicants appreciate this indication of allowability, but respectfully submit that at least claim 1, from which these claims depend, is allowable for at least the reasons indicated below.

The Office Action, on page 3, rejects claims 1, 5, 6, 8, 11 and 17 under 35 U.S.C. §103(a) over U.S. Patent No. 6,839,152 to Fan et al. (hereinafter "Fan") in view of U.S. Patent No. 6,222,945 to Cheung et al. (hereinafter "Cheung"). The Office Action, on page 7, rejects claims 2-4, 12-14 and 18-20 under 35 U.S.C. §103(a) over Fan in view of Cheung and further in view of U.S. Patent No. 6,725,247 to Acharya. These rejections are respectfully traversed.

Independent claims 1, 11 and 17 recite, among other features, wherein the pair of filters is selected based on a top three bits of a signal generated from the determined control signal. The combination of Fan and Cheung cannot reasonably be considered to have suggested this feature.

Fan, at col. 3, lines 54-59, teaches an input pixel value $P_{in}(x, y)$ that is low-pass filtered in a conventional manner to generate a low-pass filtered pixel value, and is also separately notch filtered in a conventional manner to generate a notch-filtered pixel value.

Fan does not teach or suggest that the low-pass filter and the notch filter are selected based on a top three bits of a signal generated from the determined control signal. As such, Fan cannot reasonably be considered to teach, or to have suggested the above-recited feature.

Cheung teaches a filter selection module 110 that performs a filter selection. The selection routine is implemented to sequentially cycle through the plurality of order filters such that a filter is initially selected from the plurality of ordered filters in accordance with the pre-selected order. The pre-selected order involves selection of a filter having a lowest index value among the plurality of filters. An edge detection process is performed to determine whether the selected filter includes an image edge within the region of the support of the selected filter. A portion of an image contains an image edge if it does not have a constant color or grayscale (see, e.g., col. 3, lines 21-30).

Cheung further discloses that if an image edge is included within their region of support of the presently selected filter, the next highest ordered filter is selected for processing. If the selected filter region of support does not include an image edge, a determination of whether the presently selected filter is a member of an asymmetric filter pair is made. If so, the region of support of the second member of the asymmetric filter pair is processed to determine if it includes an image edge.

If the second member includes an image edge, the presently selected filter is used for processing of the selected portion of the dithered image. If an image edge is not included within the region of support of the second member of the asymmetric filter pair, an indication is provided that no filtering is to be done on the selected portion of the dithered image (see, e.g., col. 3, lines 31-45). If an image edge is not included within the region of support of the presently selected filter and the filter is not a member of an asymmetric filter pair, a determination of whether the filter is a member of a group of substantially identical support filters is made. If not, the presently selected filter is used for processing of the selected

portion of the dithered image. For a filter belonging to a group of substantially identical support filters, Cheung teaches that a determination is made of the number of the group of substantially identical support filters. Next, a computation of an activity measure of the region of support for the group of identical support filters is calculated and used to select a member of the group of identical support filters to filter the selected portion of the dithered image. The activity measure indicates the magnitude of local variation in the dithered image. The selected filter is then used to process the selected portion of the dithered image (see, e.g., col. 3, lines 46-61).

Based on this disclosure of Cheung, it is clear that the filters that are selected in Cheung are not selected based on a top three bits of a signal generated from the determined control signal. As such, Cheung cannot reasonably be considered to teach, or to have suggested the above-recited feature.

For at least the above discussion, the combination of Fan and Cheung cannot reasonably be considered to have suggested the feature wherein the pair of filters is selected based on a top three bits of a signal generated from the determined control signal. As such, the combination of Fan and Cheung cannot reasonably be considered to have suggested the combinations of all of the features positively recited in independent claims 1, 11 and 17. Further, claims 5, 6 and 8 also are not suggested by the combination of Fan and Cheung for at least the respective dependence of these claims directly on independent claim 1, as well as for the additional features each of these claims recites. Additionally, claims 2-4, 12-14 and 18-20 are also not suggested by the combination of Fan and Cheung, even in combination with Acharya, which is not applied in a manner that remedies the above-identified shortfalls in the application of the other references to at least the subject matter of independent claims 1, 11 and 17, from which these claims depend.

Accordingly, reconsideration and withdrawal of the rejections of claims 1, 5, 6, 8, 11 and 17 under 35 U.S.C. §103(a) are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-6 and 11-20 in addition to the indication of allowability of claims 7, 9 and 10, are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: November 30, 2007

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